

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

RAMI AWAD, <i>et al.</i>, Plaintiff v. NATIONAL CITY BANK, <i>et al.</i>, Defendants	CASE NO. 1:09-cv-0261 Judge James S. Gwin
PLAINTIFFS' ATTORNEYS'-FEES-AND-COSTS-BUDGET ESTIMATE UNDER CASE-MANAGEMENT-CONFERENCE-SCHEDULING ORDER	

Plaintiff respectfully submits the following attorneys'-fees-and-costs-budget estimate for this case, as required in the Court's case-management-conference-scheduling order. The estimate is based on Lodestar methodology:

ATTORNEYS' FEES

Preliminary Investigation and Filing Complaint	\$16,250
Procedural-Motions Practice	\$10,000
Discovery	\$150,000 ¹
Dispositive-Motions Practice	\$45,000
Settlement Negotiations	\$35,000
Trial	\$100,000

COSTS

Depositions	\$44,000
Experts	\$5,000
Witness Fees	\$2,000
Other	\$7,000

¹ This figure is largely dependent upon the number of witnesses ultimately identified, the volume of documents that need to be analyzed, and the degree of cooperation that Defendants afford in the discovery process. The figure assumes that about 22 depositions will be taken, that Defendants are cooperative, and that no motions to compel will need to be filed. To that extent, it may be an underestimate. To the extent that attorneys with lower billable rates may be assigned to certain tasks and some depositions may be shorter, it may be an overestimate.

TOTAL FEES \$

\$356,250

TOTAL COSTS

\$58,000

Respectfully submitted,

THE CHANDRA LAW FIRM, LLC

/s Subodh Chandra

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Attorneys for Plaintiff

Certificate of service

I respectfully certify that my office sent the above document to all counsel of record through the Court's electronic-case-filing (ECF) system.

/s/Subodh Chandra
One of the attorneys for Plaintiff Rami Awad